

# **EXHIBIT 4**

**Condensed Transcript**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IAN J. BROWN, JAMES BROWN, and  
BARBARA BROWN,

Plaintiffs,

VS

CIVIL ACTION NUMBER:  
04-11924-RGS

UNITED STATES OF AMERICA,  
VERIZON NEW ENGLAND, INC., and  
BOSTON EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

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**DEPOSITION OF**

**ARMAND L.C. OUELLETTE**

June 2, 2006  
2:35 p.m.

Hanscom Air Force Base  
20 Schilling Circle  
The Brown Building  
Bedford, Massachusetts

Amanda Stevens, Notary Public and Professional Shorthand Reporter,  
within and for the Commonwealth of Massachusetts.



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Armand L. Ouellette

June 2, 2006

<p style="text-align: center;">33</p> <p>1 Q. What about -- To your knowledge, 2 has the government ever leased it? You 3 have to answer "yes" or "no." 4 A. No. No. Sorry. 5 Q. Mr. Ouellette, if I told you that 6 there was a deposition taken of an 7 individual named Joseph Broderick who said 8 that -- he was asked if he had ever heard 9 of someone named Armand Ouellette, and he 10 said, "I think there may have been a guy 11 at Raytheon named Andy Ouellette." I know 12 you've testified you never worked at 13 Raytheon, but do you go by Andy at all? 14 A. Nope. 15 Q. Okay. 16 A. And I don't know that gentleman, 17 either. 18 Q. You don't know Broderick? 19 A. No. 20 Q. Okay. I want to refer you back to 21 the guardrail that's reflected on the 22 photographs I've shown you, Genetti Exhibit 23 Nos. 4 and 6. Do you know when that 24 guardrail was put up?</p>	<p style="text-align: center;">35</p> <p>1 as a superintendent of -- 2 A. Yes. 3 Q. -- of parks and equipment? 4 A. Of pavements and equipment. 5 Q. Of pavements and equipment. I'm 6 sorry. 7 A. Same thing. We take care of the 8 parks, too. 9 Q. Was there a guardrail there prior 10 to the guardrail that you've just 11 described being erected around that time? 12 A. I don't believe so. 13 Q. Okay. 14 A. That's why they kept running into 15 the fence. 16 Q. Now, you had said that Raytheon was 17 having a problem with people running into 18 the fence. 19 A. Mm-hmm. 20 Q. Can you explain to me what the 21 relationship would be of Raytheon to that 22 area? 23 A. Well, them hangars were top secret, 24 and they didn't want anybody getting in</p>
<p style="text-align: center;">34</p> <p>1 A. No. I sure don't. It was -- 2 Raytheon used to have a problem with 3 people running into the fence. 4 Q. And just for the record, you're 5 pointing to the fence right beyond -- 6 A. Right. On the lower plain. 7 Q. Right. Yes. 8 A. All along in there they 9 (indicating) -- everybody was always 10 running into it, and somebody finally 11 decided to put a guardrail there. I don't 12 know who. 13 Q. Do you know approximately when that 14 decision was taken to put the guardrail 15 in? 16 A. They put it in there to protect the 17 fence after they put the new fence in. I 18 would say 15, 16 years ago anyways. 19 Q. So that would be approximately 20 1990? 21 A. Yeah. 22 Q. Okay. 23 A. In that time frame. 24 Q. And at that time, you were serving</p>	<p style="text-align: center;">36</p> <p>1 there. So it was more or less a 2 perimeter fence, to keep people away from 3 the two hangars. 4 Q. And if this is running east -- 5 Again, I'm pointing to Genetti Exhibit No. 6 4 -- If this road is pointing east, as 7 we're looking at it, going east -- 8 A. Mm-hmm. 9 Q. So you're referring to the fence 10 that's on the south side of the road? 11 A. Right. 12 Q. And is it your testimony that on 13 the southern side of that fence there were 14 top secret hangars? 15 A. Yes. They were doing -- They were 16 doing secret projects, and they even put 17 slats in the fence. 18 Q. Okay. 19 A. You can't -- You can't hardly see 20 it in there, but it's -- it's there. 21 Q. And the purpose of the slats was 22 for privacy? 23 A. Like I said, they were, you know, 24 secret. They were doing secret shit</p>



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Armand L. Ouellette

June 2, 2006

<p style="text-align: center;">49</p> <p>1 Q. Now, you mentioned that Raytheon 2 had this fence around the hangars because 3 there was some top secret -- 4 A. Mm-hmm. 5 Q. -- work going on in the hangar. 6 Do you remember when the fence was put it 7 in? 8 A. No. It was always -- There was 9 always a fence there. 10 Q. Okay. At one point you said a new 11 fence. 12 A. Right. 13 Q. Did they replace the fence? 14 A. Right. Several times. 15 Q. They replaced it several times? 16 A. Right. Because people were running 17 into it, tearing it down. 18 Q. Now, did you ever actually see an 19 accident on Hartwell Road -- 20 A. No. 21 Q. -- when someone hit the fence? Did 22 you ever see the fence damaged? 23 A. Yes. 24 Q. Can you tell me approximately when,</p>	<p style="text-align: center;">51</p> <p>1 know who was responsible for replacing the 2 fence? 3 A. No, I don't. 4 Q. You said it was your understanding 5 that the guardrail was installed about 14 6 or 15 years ago -- 7 A. Mm-hmm. 8 Q. -- is that right? 9 A. Yes. 10 Q. So that would be about 1990? 11 A. Yes. 12 MR. LEWIN: That's all I 13 have. Thanks. 14 EXAMINATION 15 BY-MR. CALLAHAN: 16 Q. Mr. Ouellette, my name is Michael 17 Callahan. I have a few questions. 18 I have seen references to what's 19 been described as Hanscom Field and 20 Hanscom Air Force Base. 21 Can you, to your knowledge, tell me 22 what the difference between those two 23 locations is? 24 A. Yes. Hanscom Field was the</p>
<p style="text-align: center;">50</p> <p>1 if you can recall, you saw the fence 2 damaged? 3 A. No. I can't recall. 4 Q. How about how many times? 5 A. Three or four times, anyways. 6 Q. Had you ever heard of anyone 7 hitting the telephone pole during that 8 time? 9 A. Nope. 10 Q. So it's your understanding that 11 some people had accidents with the fence, 12 but not the telephone poles? 13 A. Right. 14 Q. Do you know who was responsible for 15 installing the fence around the Raytheon 16 facilities? 17 A. No. 18 Q. It was not your department, though? 19 A. It wasn't mine. 20 Q. Do you know if it was Raytheon or 21 someone hired by Raytheon? 22 A. I -- I don't know. It was up when 23 I got here in '78. 24 Q. But when it was replaced, do you</p>	<p style="text-align: center;">52</p> <p>1 original name for the base; however, in 19 2 -- I would say '75, '76 a Colonel 3 Sharpshaw (phonetic), who was base 4 commander at the time had it changed from 5 Hanscom Field to Hanscom Air Force Base. 6 However, the Massport portion of it has 7 kept the Hanscom Field, and this is the 8 difference between the two now. You have 9 the base, Hanscom Air Force Base and 10 you've got Hanscom Field. 11 Q. And I got a little bit lost when I 12 was coming in here today. I ended up 13 over in the -- what is referred to -- 14 A. The terminal? 15 Q. -- as the civilian air 16 facilities -- 17 A. Right. 18 Q. -- where the terminal is. 19 A. Mm-hmm. 20 Q. Is that the Hanscom Field -- 21 A. That's the Hanscom Field. 22 Q. --location? All right. And 23 Hartwell Road that's shown on Hayes 24 Exhibit 2, does that border along the area</p>



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